

Michael E. Hansen [SBN 191737]
711 Ninth Street, Suite 100
Sacramento, CA 95814
916.438.7711
Email: mhansen@criminal-defenses.com

Attorney for NICHOLAS BANDUCCI

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS BANDUCCI,

Defendant.

No. 2:23-cr-00071-TLN

**STIPULATION AND ORDER TO
MODIFY CONDITION OF RELEASE**

IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, Shea Kenney, Assistant United States Attorney, attorney for plaintiff, and Michael E. Hansen, attorney for defendant Nicholas Banducci, that the no drive condition be modified as follows:

Mr. Banducci will be allowed to apply for a restricted license from DMV;

The restricted license will allow Mr. Banducci to drive for work purposes only.

The reason for the request is Mr. Banducci has a pending state case for an alleged DUI that is the underlying basis for the violations alleged in the supervised release petition. Resolution of that matter first is necessary to proceed in the instant matter. The state case matter is currently set for December 1, 2025. That court date is likely to continue due to a change in defense counsel. Mr. Banducci is enrolled in DUI education classes and has completed eight weeks of counseling. Mr. Banducci's employment requires driving to and from construction job sites.

1 The government and probation are not opposed to the request.

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3 Dated: November 11, 2025

Respectfully submitted,

4 /s/ Michael E. Hansen
5 MICHAEL E. HANSEN
6 Attorney for NICHOLAS BANDUCCI

7 Dated: November 11, 2025

ERIC GRANT
United States Attorney

8 /s/ Michael E. Hansen for
9 SHEA KENNEY
10 Assistant United States Attorney
11 Attorney for Plaintiff

12 **ORDER**

13 Good cause appearing, it is so ordered.

14 Dated: November 12, 2025

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16 CAROLYN K. DELANEY
17 UNITED STATES MAGISTRATE JUDGE
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